

JOHN KINZEY
212.704.6078 telephone
212.704.5914 facsimile
john.kinze@troutmansanders.com

TROUTMAN SANDERS

TROUTMAN SANDERS LLP
Attorneys at Law
The Chrysler Building
405 Lexington Avenue
New York, New York 10174-0700
212.704.6000 telephone
troutmansanders.com

March 12, 2013

BY ECF

Judge Sean H. Lane
United States Bankruptcy Judge
United States Bankruptcy Court
One Bowling Green
New York, NY 10004

**Re: John S. Pereira, as Chapter 7 Trustee for
Waterford Wedgwood USA, Inc. v. United Parcel Service of America, Inc.,
et al. Adv. Proc. No. 11-01820 (SHL)**

**John S. Pereira, as Chapter 7 Trustee for
Royal Doulton USA, Inc. v. United Parcel Service of America, Inc., et al.
Adv. Proc. No. 11-02177 (SHL)**

Dear Judge Lane:

Under the Court's pre-trial procedures, the parties' "witness statements" are due today. Although the plaintiff identified the Trustee and his accountant as trial witnesses, the parties' stipulations of fact are sufficient to establish the plaintiff's direct case, and we do not anticipate presenting either of these witnesses at trial. We thank defendant's counsel for helping to streamline the case in this way.

Motions *in limine* are also due today. The plaintiff will not be making such a motion.

Respectfully submitted,

s/John S. Kinzey
John S. Kinzey

cc: Jonathan Jordan, Esq.